

MARK J. BOURASSA, ESQ. (NBN 7999)
JENNIFER A. FORNETTI, ESQ. (NBN 7644)
VALERIE S. CHRISTIAN, ESQ. (NBN 14716)
JOSEPH P. WALDMAN, ESQ. (NBN 17010)

THE BOURASSA LAW GROUP

2350 W. Charleston Blvd., Suite 100
Las Vegas, Nevada 89102
Telephone: (702) 851-2180
Facsimile: (702) 851-2189
Email: *mbourassa@blgwins.com*
jfornetti@blgwins.com
vchristian@blgwins.com
jwaldman@blgwins.com

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

STEVEN WADE, an individual,

Plaintiff,

vs.

C AND S COMPANY INC., a domestic
corporation, and DOES 1 – 20 inclusive,

Defendants.

Case No.: 2:24-cv-01561-RFB-MDC

**STIPULATION AND ORDER TO EXTEND
DISCOVERY**

(THIRD REQUEST)

Pursuant to Federal Rule of Civil Procedure 26(f), and District of Nevada Civil Local Rules, 6-1 and 26-3 and for good cause described herein, the parties, Plaintiff Steven Wade, and Defendant C and S Company Inc., (“Defendant”) by and through their respective counsel of record, hereby request this Court to adopt and approve this stipulated extension to the discovery plan, and continue the discovery deadlines for 90 days as requested herein:

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I. LOCAL RULE 6-1 IS SATISFIED

This is the third request for an extension of discovery deadlines filed by the parties. Pursuant to the Order dated May 1, 2025 (ECF No 32), the following dates govern for purposes of discovery:

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|--|-------------------------------|
| 1. Discovery Cutoff Date: | July 21, 2025 (next day) |
| 2. Motions to amend pleadings and add parties: | No extension |
| 3. Expert Designations: | No extension |
| 4. Rebuttal Expert Designations: | No extension |
| 5. Dispositive Motions: | August 19, 2025 |
| 6. Joint Pre-Trial Order: | September 22, 2025 (next day) |

The parties have been diligently pursuing discovery on all aspects of the case and are working in good faith to reach an amicable resolution. Because of several discovery disputes, the discovery timeline has been delayed. Plaintiff has outstanding discovery requests that this Court only recently compelled production upon.

This Court compelled production of Requests No 35 and 37 from Plaintiff's second Set of Requests for Production with a due date of June 30, 2025. (ECF No 37).

This Court recently heard the parties' discovery dispute on June 17, 2025 and ordered the production of additional documents by July 17, 2025 (ECF No 38). Plaintiff needs time to review these documents and to utilize them during a FRCP 30(b)(6) deposition of Defendant. Plaintiff anticipates there may be other individuals revealed by the deposition that he may also need to depose. Specifically, individuals involved in the payroll process and from the Southern Nevada Chapter of the National Electrical Contractors Association, but requires the outstanding discovery in order to adequately depose these witnesses.

Furthermore, Defendant intends to depose key witnesses including the Plaintiff, and Adriana Juaregui-Meraz. Due to the fact that significant discovery still needs to take place, and the anticipated production of a large amount of documents, the parties are requesting a 90-day extension to the current discovery deadlines.

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The instant request comports with Local Rule 6-1, in that no request is being made after the expiration of the specified period.

II. LOCAL RULE 26-3 IS SATISFIED

The instant request to extend discovery deadlines satisfies the requisites of Local Rule 26-3. This request is made more than 21 days from the subject deadline and is supported by a showing of good cause.

The parties agree that the extension requested is made in good faith and will allow for the additional fact discovery to be completed before the upcoming proposed deadlines. As a result, the parties have requested the remaining discovery deadlines be extended 90 days.

Discovery Completed:

DISCOVERY	DATE SERVED
Plaintiff's Initial Disclosures	September 23, 2024
Defendant's Initial Disclosures	September 24, 2024
Plaintiff's First Set of Requests for Admission to C AND S COMPANY, INC.	December 12, 2024
Plaintiff's First Set of Requests for Production to C AND S COMPANY, INC.	December 12, 2024
C AND S COMPANY'S Response to Plaintiff's First Set of Requests for Admission	January 23, 2025
C AND S COMPANY'S Response to Plaintiff's First Set of Requests for Production	January 23, 2025
C AND S COMPANY'S Supplemental Response to Plaintiff's First Set of Requests for Production	March 4, 2025
C AND S COMPANY'S First Set of Requests for Admission to Plaintiff	February 14, 2025
C AND S COMPANY'S First Set of Request for Production to Plaintiff	February 14, 2025
C AND S COMPANY'S First Set of Interrogatories to Plaintiff	February 14, 2025
Plaintiff's Response to C AND S COMPANY'S First Set of Requests for Admission to Plaintiff	April 2, 2025
Plaintiff's Response to C AND S COMPANY'S First Set of Request for Production to Plaintiff	April 2, 2025
Plaintiff's Response to C AND S COMPANY'S First Set of Interrogatories to Plaintiff	April 2, 2025
Plaintiff's Second Set of Requests for Admission to C AND S COMPANY, INC	April 2, 2025

Plaintiff's Second Set of Requests for Production to C AND S COMPANY, INC	April 2, 2025
Plaintiff's First Set of Interrogatories to C AND S COMPANY, INC	April 2, 2025
C AND S COMPANY'S Response to Plaintiff's Second Set of Requests for Admission	May 9, 2025
C AND S COMPANY'S Response to Plaintiff's Second Set of Requests for Production	May 9, 2025
C AND S COMPANY'S Response to Plaintiff's First Set of Interrogatories	May 9, 2025
Order Granting and Denying in Part Stipulation Regarding Discovery Dispute	May 30, 2025
Plaintiff's Second Set of Interrogatories to C AND S COMPANY, INC	June 3, 2025
Plaintiff's Third Set of Requests for Production to C AND S COMPANY, INC	June 3, 2025

Discovery Remaining:

1. Defendant's responses to Plaintiff's First Set of Requests for Production, Requests No 4, 7, and 8-34.
2. Defendant's responses to Plaintiff's Second Set of Requests for Production, Requests No 35 and 37.
3. Defendant's responses to Plaintiff's Second Set of Interrogatories
4. Defendant's responses to Plaintiff's Third Set of Request for Production.
5. Plaintiff intends to take a FRCP 30(b)(6) deposition of defendant.
6. Defendant intends to depose key witnesses, including Plaintiff and Adriana Juaregui-Meraz.

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Proposed Schedule for Completing All Remaining Discovery:

Finally, under Local Rule 26(4), it is necessary to articulate a proposed schedule for completing all remaining discovery. The parties are requesting an additional 90 days be afforded for discovery. The following deadlines are requested.

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|--|------------------------------|
| 1. Discovery Cutoff Date: | October 20, 2025 (next day) |
| 2. Motions to amend pleadings and add parties: | No Extension |
| 3. Expert Designations: | No extension |
| 4. Rebuttal Expert Designations: | No extension |
| 5. Dispositive Motions: | November 17, 2025 |
| 6. Joint Pre-Trial Order: | December 22, 2025 (next day) |

DATED this 27th day of June 2025

DATED this 27th day of June 2025

THE BOURASSA LAW GROUP

SNELL & WILMER LLP

By: /s/ Joseph P. Waldman

By: /s/ Xyzlo Lee

MARK J. BOURASSA, ESQ. (NBN 7999)
JENNIFER A. FORNETTI, ESQ. (NBN 7644)
VALERIE S. CHRISTIAN, ESQ. (NBN 14716)
JOSEPH P. WALDMAN, ESQ. (NBN 17010)
2350 W Charleston Blvd, Suite 100
Las Vegas, Nevada 89102

PAUL S. PRIOR, ESQ. (NBN 9324)
XYZLO LEE, ESQ. (NBN 16912)
1700 South Pavilion Center Drive, Ste. 700
Las Vegas, Nevada 89135

Attorneys for Defendant

Attorneys for Plaintiff

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: 6-30-25

CASE NO.: 2:24-cv-01561-RFB-MDC

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of The Bourassa Law Group, and that on this date I caused to be served a true copy of **STIPULATION AND ORDER TO EXTEND DISCOVERY** on all parties to this action by the method(s) indicated below:

X by using the Court's CM/ECF Electronic Notification System addressed to:

Bradley T. Austin, Esq.
Paul S. Prior, Esq.
Theresa C. Trenholm, Esq.
Xyzlo Lee, Esq.
SNELL & WILMER LLP
1700 South Pavilion Center Drive, Ste. 700
Las Vegas, Nevada 89135

DATED: This 27th day of June, 2025.

/s/ Kylie B. VanderMiller
Employee of The Bourassa Law Group